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September 27, 2005

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: **EX PARTE SUBMISSION**

WT Docket No. 03-66; Amendment of Parts 1, 21, 73, 74 and 101 of the  
Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband  
Access, Educational and Other Advanced Services in the 2150-2162 and 2500-  
2690 MHz Bands

Dear Ms. Dortch:

Yesterday, on behalf of the National ITFS Association (NIA) and the Catholic Television Network ("CTN"), I made an ex parte presentation by telephone and by email to Fred Campbell of Chairman Martin's office, regarding the referenced proceeding.

My presentation focused on the issue whether the FCC should modify the substantive EBS lease requirement limiting such leases to 15 years. Although the FCC carried over the 15-year limit on leases when it shifted EBS leasing to the Secondary Markets regime, other parties to this proceeding are trying to undermine that principle on reconsideration. NIA and CTN believe that the 15-year limit clearly furthers the educational purposes of EBS by, among other things, ensuring an opportunity for educators to reevaluate their educational use and leasing activities on a periodic basis.

I sent the attached email to Mr. Campbell, which included a copy of the CTN and NIA Consolidated Reply in this proceeding. That filing suggests that, if the FCC is going to open up any of the substantive EBS lease requirements for scrutiny, it should do so on a wider basis, so that other issues (such as possible changes in educational reservation and use requirements) can also be evaluated.

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, we are submitting this summary of the presentation by filing an electronic copy of this letter in the public record of the proceeding.

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Should any questions arise concerning this matter, kindly contact undersigned counsel for the National ITFS Association.

Respectfully submitted,

/s/ Todd D. Gray

Todd D. Gray

cc by email: Mr. Fred Campbell  
Edwin N. Lavergne, Counsel to CTN